

California Fair Political Practices Commission

November 17, 1989

Debbie Woods Registrar of Voters, City of Riverside 4175 Main Street Riverside, CA 92501

> Re: Combined Campaign Report Our File No. I-89-620

Dear Ms. Woods:

This is to confirm advice provided to your office on October 23, 1989, regarding the campaign disclosure provisions of the Political Reform Act (the "Act"). This letter constitutes written advice under Section 84205.

Section 84205 states:

The Commission may by regulation or written advice permit candidates and committees to file campaign statements combining statements and reports required to be filed by this title.

A special recall election has been called for the City of Riverside. The election date is February 6, 1990. Because the second pre-election statement due in connection with the recall election (Section 84200.8) and the semi-annual statement due for the last six months of 1989 (Section 84200) cover overlapping periods, we believe it is appropriate for candidates being voted on in that election, their controlled committees and committees primarily formed to support or oppose candidates in that election to combine those two reports.

Government Code Sections 81000-91015. All statutory references are to the Government Code unless otherwise indicated. Commission regulations appear at 2 California Code of Regulations Section 18000, et seq. All references to regulations are to Title 2, Division 6 of the California Code of Regulations.

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Therefore, campaign disclosure statements should be filed on the following schedule:

Type of Statement	Period	d Covered		Filing Deadline
1st Pre-Election	Jan. 1	1 ² - Dec.	23	December 28, 1989
2nd Pre-Election Combined with semi-annual statement for the second half of 1989		24 - Jan.	20	January 25, 1990
Semi-Annual	Jan. 2	21 - June	30	July 31, 1990

If you have any questions regarding the above, please do not hesitate to contact me at (916) 322-5662.

Sincerely,

Kathryn E. Donovan General Counsel

By: Lynda Cassady

Political Reform Consultant

KED:LC:eab

The period covered by any statement begins on the day after the closing date of the last statement filed or January 1 if no previous statement has been filed.